

## Defining the Collection System

**Synopsis:** As the Board of Health considers secure medicine return, it must establish basic standards for what the collection system will look like and how it will operate, and also decide how much detail to include in the rule and regulation.

What's currently included in local voluntary take-back programs:

- Ongoing drop-off programs at pharmacies. Pharmacy drop-off programs can legally collect all medicines except controlled substances.
- Ongoing drop-off programs at law enforcement. Law enforcement drop-off programs can legally collect all medicines including controlled substances.
- Collection events by law enforcement. Occasional special events where all medications are accepted, including semi-annual DEA coordinated take-back events since 2010.
- Mail-back Envelopes. Some chain drugstores in King County sell mailers for disposal of unwanted medicines through a commercial program run by Sharps Compliance Inc. (See handout "Summary of Sharps Compliance".)

Considerations for this decision include:

- How much detail to specify in the regulation and how much to allow for flexibility in program design.
- How many and what type of collection options are needed to meet the needs of residents throughout the county?
- How will needs of special populations, such as housebound residents, be addressed?
- How does the "convenience standard" and standards for operation of the collection system impact existing voluntary medicine take-back programs? How does it impact potential collectors?

**Policy decisions to be made:**

1. **Types of collection methods the product stewardship program may utilize, as appropriate under state and federal law.**

Collection Method	Allowed?	Any preferences or qualifications?
A. Ongoing drop-off locations at pharmacies		
B. Ongoing drop-off locations at law enforcement offices		
C. Ongoing drop-off locations at any entities approved by DEA for drug take-back in future		
D. Collection events		
E. Mail-back		

Considerations:

- Challenge to meet the needs of county residents with limited mobility or access to transportation, such as seniors or disabled residents.

**2. Define the “convenience standard” to establish the requirement for number and geographic locations of collection options (as selected in 1) that must be provided by the product stewardship program.**

The legislation’s standard could:

- A. define the exact number of locations that must be provided (either a fixed number or a formula), or
- B. define a minimum number, or
- C. define a minimum number, and require the program to accept any collector that agrees to operate under approved protocols, or
- D. leave it to the product stewardship program to propose the number and locations of collections sites to achieve the “convenience standard” (See handouts “Examples of Collection System Standards from Product Stewardship Laws & Regulations” and “Convenience Standard Example”).

Considerations:

- If collectors are allowed to participate voluntarily, how will the policy accommodate any barriers to identifying and securing partnerships with collection sites to achieve the convenience standard?
- Challenge to meet the needs of county residents with limited mobility or access to transportation, such as seniors or disabled residents.

**3. Requirements for collection procedures to be used by the product stewardship program.**

- Pharmacy take-back programs in King County operate under protocols approved by the WA State Board of Pharmacy and are very similar to protocols developed by the PH:ARM project, which was led by LHWMP.
- Law enforcement take-back programs in King County operate under protocols that are very similar to the pharmacy protocols, and are conditionally approved by the DEA.
- Existing programs have identified efficient practices used at some locations, such as removing pills from packaging at point of collection to reduce disposal costs and promote recycling of packaging.

The legislation’s standard could:

- A. Provide general guidance on goals that must be met by the stewardship program’s collection protocols, or
- B. Could specify that specific protocols be utilized.

See examples of general guidance in handout on “Examples of Collection System Standards from Product Stewardship Laws & Regulations”.

Considerations:

- How will selected standards for operation of the collection system impact existing voluntary medicine take-back programs that operate in multiple counties or regions?

---

*Attachments:*

- *Examples of Collection System Standards from Product Stewardship Laws & Regulations*
- *Convenience Standard Example: Formula for Number of Collection Sites*
- *Summary of number and locations of pharmacies in King County*
- *Summary of Sharps Compliance Inc. Take-Away Environmental Return System in King County*
- *Policy Comparison Table: #1 “Medicines Accepted for Return (covered drugs)”*
- *King County-wide Medicine Take-back System Cost Estimate*